

REMARKS/ARGUMENTS

Claims 1-9 and 11-15 are pending. Claims 12 - 15 stand rejected under 35 U.S.C. 102(e) as being anticipated by Ishigaki (US 2001/0017855 A1). Claims 1-9, and 11 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Smether (US 6,463,304) in view of Ishigaki (US 2001/0017855 A1). Applicants respectfully traverse the rejections.

Claims 12 -15 Are Not Anticipated

Claims 12 - 15 stand rejected under 35 U.S.C. 102(e) as being anticipated by Ishigaki (US 2001/0017855 A1). Applicants respectfully traverse the rejection.

In response to the rejections of Claims 12 - 15, Applicants state that an aspect of the invention relates to a browser suitable for an apparatus, such as a mobile telecommunication device. In an embodiment, the operation of one of the soft keys of the device actuates a function to access previously visited pages. By operating the key with a short press, the first mode of the individual key is actuated and the browser displays the last visited page. By operating the key with a long press, the second mode of the individual key is actuated, and the browser displays a list of previously visited pages such that the user can select the desired page and navigate directly thereto.

Ishigaki discloses a mobile telephone which can be used to browse the Internet. By navigating a menu, the telephone can be made to display a list of previously stored network addresses. The memory of the mobile telephone can also store a numbered list of network addresses and pressing a key corresponding to a number in the list causes the mobile telephone to access the network address associated with that number. Additionally, pressing the "0" key in the browser mode causes the last visited page to be rendered.

While Ishigaki does disclose the use of the "0" key to navigate to the last visited page, there is no disclosure of the same individual key also being used to provide a display of previously visited homepages. Rather, Ishigaki discloses in paragraph 85 that to display the "content of memory 26 storing the history" (display of previously visited pages) "an 'i-mode main' icon is called. Further, an 'i-mode main' screen is selected,

and then an 'iMenu' (not shown) is selected, whereby a "sub-menu screen" as shown in FIG. 13A can be displayed by operating the left soft key 5. Herein, the user selects the "Internet" which is displayed in reverse." Thus a series of menu options have to be navigated to provide the display of previously visited pages and there is no disclosure of this being achieved by using the "0" key. Consequently, there is no disclosure of operating the same individual key (the "0" key in Ishigaki) to provide a display of previously visited pages. Thus, the reference does not disclose or suggest "operating an individual key of the device in a first mode to navigate between previously visited pages, operating the individual key in a second mode to provide a display of previously visited homepages." Because the reference does not disclose an individual key with a "first mode to navigate between previously visited pages" and a "second mode to provide a display of previously visited homepages," Claims 12 and 13 are not anticipated by Ishigaki. Dependant Claims 14 and 15 are allowable for at least the same reasons as the independent Claims 12 and 13, from which they ultimately depend.

Claims 1-9 and 11 Are Not Obvious

Claims 1-9, and 11 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Smether (US 6,463,304) in view of Ishigaki (US 2001/0017855 A1). Applicants respectfully traverse the rejections.

In response to the rejections of Claim 1, Applicants again state that an aspect of the invention relates to a browser suitable for an apparatus, such as a mobile telecommunication device. In an embodiment, the operation of one of the soft keys of the device actuates a function to access previously visited pages. By operating the key with a short press, the first mode of the individual key is actuated and the browser displays the last visited page. By operating the key with a long press, the second mode of the individual key is actuated, and the browser displays a list of previously visited pages such that the user can select the desired page and navigate directly thereto.

Smethers discloses a mobile communication device with a graphical user interface. Different applications resident on the device (the launch screens of which appears to be considered by the Examiner to map onto the previously visited pages of claim 1) can be navigated to by using a navigation key to select an icon from a list of

icons on a main start screen. The main start screen, listing the applications (which appears to be considered by the Examiner to map onto the display of previously visited pages of claim 1) can be displayed at any time by pressing a special key, the “Rocker Key.” In the June 5, 2007 Office Action, the Examiner admits that Smethers does not disclose the feature of claim 1 of an individual key “operable in a first mode comprising a first user depression sequence pattern of said individual key to navigate between previously visited pages.” Applicants agree with the Examiner on this point. Further, Applicants note that Smethers additionally fails to disclose an individual key “operable in a second mode comprising a second user depression sequence pattern of said individual key to provide a display of previously visited pages.”¹ Nevertheless, to support the current rejection, the Examiner argues that this feature is obvious over Ishigaki, asserting that Ishigaki teaches an individual key operable in a first mode and first depression sequence and a second mode and second depression sequence, to provide a display of previous visited pages by pressing one single key.

Starting from the disclosure of Smethers, if a skilled person wanted to modify the system of Smethers to result in a browser that falls into the scope of claim 1, it is required that the same individual key be used to navigate to a previously visited page and to display a list of previously visited pages. However, such a modification would not lead to a functioning system. Neither Ishigaki nor Smethers disclose or suggest how to distinguish between different functions implemented using the same individual key. For example, if a user is in the browser mode of operation in the system of Smethers and the Rocker Key is pressed, the control software of the user interface would not know whether the user meant to go to the main start page (display of previously visited pages) or to another webpage (previously visited page) as taught by Ishigaki. Therefore, a skilled person would not make the modification.

Applicants disagree that the feature of claim 1 of an individual key operable in a first mode and second mode is obvious in view of the disclosure of Ishigaki. As noted above, Ishigaki discloses a mobile telephone which can be used to browse the Internet.

¹ Applicants respectfully refer to the August 3, 2006 Office Action, wherein the Examiner acknowledged that “Smethers fails to disclose an individual key operable in a first mode and in a second mode.”

By navigating a menu, the telephone can be made to display a list of previously stored network addresses. The memory of the mobile telephone can also store a numbered list of network addresses and pressing a key corresponding to a number in the list causes the mobile telephone to access the network address associated with that number. Additionally, pressing the “0” key in the browser mode causes the last visited page to be rendered. The reference does not teach the operation of a single key “operable in a first mode comprising a first user depression sequence pattern of said individual key to navigate between previously visited pages” and “second mode comprising a second user depression sequence pattern of said individual key to provide a display of previously visited pages whereby to permit the user to select a page from the display of previously visited pages” as required by the invention. Therefore, the subject matter of claim 1 is not obvious in view of a combination of Smethers and Ishigaki. Dependant Claims 2 – 9, and 11 are allowable for at least the same reasons as the independent Claim 1 from which they ultimately depend.

Additional Basis For Allowance

In addition to the reason noted above, dependant Claim 4 is allowable for at least one additional reason. Dependent Claim 4 recites the feature of “the first and second modes are selected by operating said individual key for relatively shorter and longer periods respectively.” Nowhere in Smethers or Ishigaki is there any disclosure that could be interpreted to anticipated the disclosed feature of claim 4 of selecting the first and the second modes by “operating said individual key for relatively shorter and longer periods respectively.” The portion of Smethers referenced by the Examiner as disclosing the feature of claim 4 provides a description of the location of icons in a circle by referring to the position of hands of a clock at different times. Applicants cannot see how the Examiner can construe this disclosure as anticipating the feature of selecting the first and the second modes by operating said individual key for relatively shorter and longer periods respectively. Further, the Ishigaki reference, including paragraph 96 noted by the Examiner, fails to disclose anything about operating the key for longer or shorter periods of time.

Conclusion

Therefore, for at least the above reasons, Claims 12 and 13 are not anticipated and are allowable over Ishigaki, and Claim 1 is not obvious and is allowable over the combination of Smethers and Ishigaki. Dependant Claims 2 – 9, 11, 14 and 15 are allowable for at least the same reasons as the independent Claims 1, 12 and 13, from which they ultimately depend.

For these reasons, allowance is respectfully solicited.

Respectfully submitted,

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